

2013 MAR -5 PM 4:39  
U.S. DISTRICT COURT  
CLERK'S OFFICE  
CLEVELAND, OHIO

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

UNITED STATES OF AMERICA, ) INDICTMENT  
                                ) **1:13CR122**  
Plaintiff,                 ) CASE NO.  
v.                            ) JUDGE **JUDGE RONALD**  
LEJON C. WOODS,            ) Title 18, Section 1951, United States  
Defendant.                 ) Code  
                              )

The Grand Jury charges:

General Allegations

At all times material to this Indictment:

Relevant Persons and Entities

1. Business 1 was located in the Northern District of Ohio and engaged in interstate commerce through the ownership and management of apartment communities outside the State of Ohio.
2. Business 2 was located in the Northern District of Ohio and engaged in interstate commerce through the construction and management of commercial and residential properties, outside the State of Ohio.

3. Nonprofit 1 was located in the Northern District of Ohio and engaged in interstate commerce.

4. LEJON C. WOODS was employed by the City of Cleveland, Office of Equal Opportunity (OEO), as a Contract Compliance Officer with employment duties that included investigation and penalty imposition for failure to comply with OEO programs.

City of Cleveland Office of Contract Compliance Regulations

5. When City of Cleveland funds were used to pay for any part of a construction or rehabilitation project, the company involved in the project was subject to City of Cleveland, Office of Contract Compliance regulations about the hiring of certain percentages of minority business enterprises (MBEs), disadvantaged business enterprises (DBEs), and City of Cleveland resident workers.

6. After the construction or rehabilitation projects were completed, the City of Cleveland withheld ten percent (10%) of the funds provided for the project from the contracting company until all compliance issues were addressed. In addition, the City of Cleveland imposed fines for compliance violations.

7. As a Contract Compliance Officer, WOODS had access to and control over records and reports relating to a contracting company's compliance with the above City of Cleveland, Office of Contract Compliance regulations.

Bribery and Extortion Scheme

COUNT 1  
(Extortion Under Color of Official Right)

The Grand Jury further charges:

9. The allegations contained in paragraphs 1 and 4 through 7 of this Indictment are incorporated herein as if fully set forth.

10. From on or about May 18, 2010 and continuing through on or about June 14, 2010, in the Northern District of Ohio, Eastern Division, the Defendant, LEJON C. WOODS, did knowingly attempt to obstruct, delay, and affect commerce and the movement of articles and commodities in commerce by extortion; that is, WOODS obtained property, to wit: \$2,800 cash, not due to him or his office, from an individual WOODS believed was a representative of Business 1, with the consent of Business 1, under color of official right.

All in violation of Title 18, United States Code, Section 1951.

COUNT 2  
(Extortion Under Color of Official Right)

The Grand Jury further charges:

11. The allegations contained in paragraphs 2 and 4 through 7 of this Indictment are incorporated herein as if fully set forth.

12. From on or about June 16, 2010, through on or about July 19, 2010, in the Northern District of Ohio, Eastern Division, the Defendant, LEJON C. WOODS, did knowingly attempt to obstruct, delay, and affect commerce and the movement of articles and commodities in commerce by extortion; that is, WOODS obtained property, to wit: \$3,000 cash, not due to him or his office, from a representative of Business 2, with the consent of the representative of Business 2, then cooperating with the Federal Bureau of Investigation ("FBI"), under color of official right.

- 4 -

All in violation of Title 18, United States Code, Section 1951.

COUNT 3  
(Extortion Under Color of Official Right)

The Grand Jury further charges:

13. The allegations contained in paragraphs 3 and 4 through 7 of this Indictment are incorporated herein as if fully set forth.
14. On or about August 5, 2010, in the Northern District of Ohio, Eastern Division, the Defendant, LEJON C. WOODS, did knowingly attempt to obstruct, delay, and affect in any way and degree interstate commerce and the movement of articles and commodities in interstate commerce by extortion; that is, LEJON C. WOODS attempted to obtain property, to wit : \$1,200 cash, not due to him or his office from a representative of Nonprofit 1, with the consent of the representative of Nonprofit 1, who reported the attempt to the FBI, under color of official right.

All in violation of Title 18, United States Code, Section 1951.

A TRUE BILL.